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Attorneys for Defendant Facebook, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., a Delaware Corporation
headquartered in California,

Defendant.

Case No. 5:20-cv-08570-LHK -VKD

**STIPULATION TO ENTER
STIPULATED INTERIM 502(d)
ORDER**

Judge: Hon. Lucy H. Koh

1 Defendant Facebook, Inc. (“Facebook” or “Defendant”) and Plaintiffs Maximilian Klein,
2 et al. (“Plaintiffs”), by and through their respective counsel, hereby stipulate as follows:

3 WHEREAS, the parties are currently negotiating a final 502(d) order and have made
4 substantial progress towards agreement on many provisions and narrowing their disputes on
5 others.

6 WHEREAS, the parties have agreed to exchange final positions by May 7 and jointly
7 submit any disputes to the Court in writing by May 14.

8 WHEREAS, per the Court’s April 2, 2021 Case Management Order (Dkt. 82), Defendant
9 is making a production to Plaintiffs on Monday, May 3.

10 WHEREAS, to govern that production, the parties stipulate to entry of this interim 502(d)
11 order.

12 WHEREAS, this interim 502(d) order is agreed to without prejudice to either party
13 asking for different, additional, or fewer provisions in the final 502(d) order, and the parties
14 expressly acknowledge and stipulate that they will not rely on the provisions of the interim
15 502(d) order or their compromise on the interim order in support of their respective arguments or
16 proposals as to the terms that should govern the final 502(d) order in this matter.

17 WHEREAS, the parties hereby stipulate that this interim 502(d) order shall expire as
18 soon as the final 502(d) order is entered.

19 WHEREAS, the parties jointly and respectfully request that the Court enter the parties’
20 Proposed Interim Stipulated 502(d) Order submitted herewith.

Dated: April 30, 2021

By /s/ Shana E. Scarlett

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have concurred in this filing.

Dated: April 30, 2021

By: /s/ Sonal N. Mehta
Sonal N. Mehta